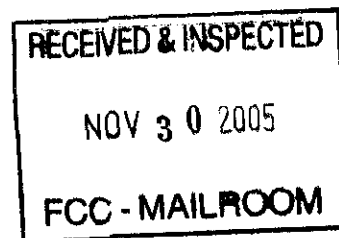


Lance J.M. Steinhart, P.C.
Attorney At Law
1720 Windward Concourse
Suite 250
Alpharetta, Georgia 30005



Also Admitted in New York
and Maryland

Telephone: (770) 232-9200
Facsimile: (770) 232-9208
Email: lsteinhart@telecomcounsel.com

November 29, 2005

VIA PRIORITY FEDERAL EXPRESS DELIVERY

Attn: Marlene H. Dortch, Commission Secretary
Office of the Secretary
Federal Communications Commission
9300 East Hampton Drive
Capitol Heights, Maryland 20743

DOCKET FILE COPY ORIGINAL

**Re: Enforcement Bureau Requirements - November 28, 2005 Updated Report
SMR Advisors, Inc. doing business as Talk Parade
Interconnected Voice Over Internet Protocol 911 Compliance Letter
WC Docket No. 05-196**

Dear Ms. Dortch:

Pursuant to WC Docket No. 05-196, please accept this original Compliance Letter and four (4) copies as SMR Advisors, Inc. doing business as Talk Parade's ("SMR") response to establishing enhanced 911 requirements for IP-enabled service providers.

A copy of this Compliance Letter is also being sent to Mr. Byron McCoy, Telecommunications Consumers Division; Ms. Kathy Berthot, Spectrum Enforcement Division; Ms. Janice Myles, Competition Policy Division; and Best Copy and Printing, Inc., Commission's copy contract via e-mail on November 29, 2005 pursuant to the FCC's enhanced 911 requirements for IP-enabled service providers June 3, 2005 Order.

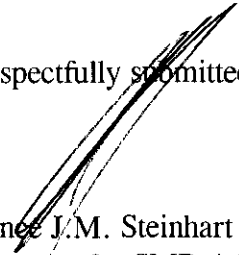
I have also enclosed an extra copy of this letter to be time stamped and returned to me in the enclosed, pre-addressed, postage prepaid envelope.

No. of Copies rec'd 044
List A B C D E

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If you have any questions or if I may provide you with additional information, please contact me at the above address, telephone number or e-mail. Thank you for your attention to this matter.

Respectfully submitted,



Lance J.M. Steinhart
Attorney for SMR Advisors, Inc.
doing business as Talk Parade

Enclosures

cc: Mr. Bob Charish

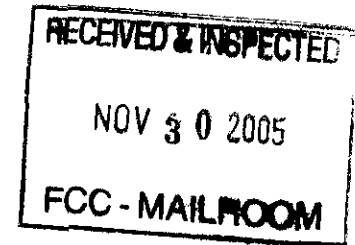
Mr. Byron McCoy (via e-mail to: byron.mccoy@fcc.gov)
Telecommunications Consumers Division, Enforcement Bureau

Ms. Kathy Berthot (via e-mail to: kathy.berthot@fcc.gov)
Spectrum Enforcement Division, Enforcement Bureau

Ms. Janice Myles (via e-mail to: janice.myles@fcc.gov)
Competition Policy Division, Wireline Competition Bureau

Best Copy and Printing, Inc. (via e-mail to: fcc@bcpiweb.com)
Commission Copy Contractor

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Compliance Letter
WC Docket No. 05-196
SMR Advisors, Inc. doing business as Talk Parade

1. 911 Solution: This description should include a quantification, on a percentage basis, of the number of subscribers to whom the provider is able to provide 911 service in compliance with the rules established in the *VoIP 911 Order*. Further, the detailed description of the technical solution should include the following components:

Response: SMR currently uses Sipmedia as its underlying provider of Service. Sipmedia gets its DID's from Level 3 communications. As part of Level 3's ELS (Enhanced Local Service) offering they provide E-911. Level 3 has recently partnered with a VPC for E911 Direct a Nomadic E911 solution of which Sipmedia is in the contract negotiation phase with Level 3 and the respective VPC. The E911 Direct solution provides a true E9-1-1 solution. The solution provided, enables a comprehensive approach to delivering E9-1-1 for Sipmedia by handling all aspects of the VoIP 9-1-1 call delivery and VoIP Positioning Center (VPC) functionality such as Master Street Address Guide (MSAG) Address Validation, ESQK management, Geocoding, real-time provisioning and routing determination.

Based on the existing Level 3 E911 Coverage, Sipmedia is able to provide E911 to 84% of SMR's existing customers.

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2. 911 Routing Information/Connectivity to Wireline E911 Network: A detailed statement as to whether the provider is transmitting, as specified in Paragraph 42 of the *VoIP 911 Order*, “all 911 calls to the appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority utilizing the Selective Router, the trunk line(s) between the Selective Router and the PSAP, and such other elements of the Wireline E911 Network as are necessary in those areas where Selective Routers are utilized.”¹ If the provider is not transmitting all 911 calls to the correct answering point in areas where Selective Routers are utilized, this statement should include a detailed explanation why not. In addition, the provider should quantify the number of Selective Routers to which it has interconnected, directly or indirectly, as of November 28, 2005.

Response: Through our underlying provider Sipmedia’s arrangement with Level 3. Level 3’s E911 service provides direct connectivity to all Selective Routers within its 911 service area. All 911 calls routed using Level 3’s E911 services are routed by the Selective Routers to the appropriate PSAP on dedicated trunk lines or are otherwise directly routed to the appropriate PSAP. Level 3 currently has direct connectivity to approximately 315 Selective Routers, and expects this number to increase by November 28, 2005.

¹ *VoIP 911 Order*, 20 FCC Red at 10269-70, ¶ 42 (footnote omitted).

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3. Transmission of ANI and Registered Location Information: A detailed statement as to whether the provider is transmitting via the Wireline E911 Network the 911 caller's ANI and Registered Location to all answering points that are capable of receiving and processing this information. This information should include: (i) a quantification, on a percentage basis, of how many answering points within the provider's service area are capable of receiving and processing ANI and Registered Location information that the provider transmits; (ii) a quantification of the number of subscribers, on a percentage basis, whose ANI and Registered Location are being transmitted to answering points that are capable of receiving and processing this information; and (iii) if the provider is not transmitting the 911 caller's ANI and Registered Location to all answering points that are capable of receiving and processing this information, a detailed explanation why not.

Response: *Fixed Location VoIP Services:* Level 3 provides inbound and outbound calling as well as fixed location E911 as part of a bundled service, for which Level 3 issues only geographically relevant telephone numbers based on the end-user address provided to Level 3 by Sipmedia for SMRCustomers. For fixed-location E911, Level 3 will transmit ANI to the appropriate PSAP as forwarded to them from Sipmedia.

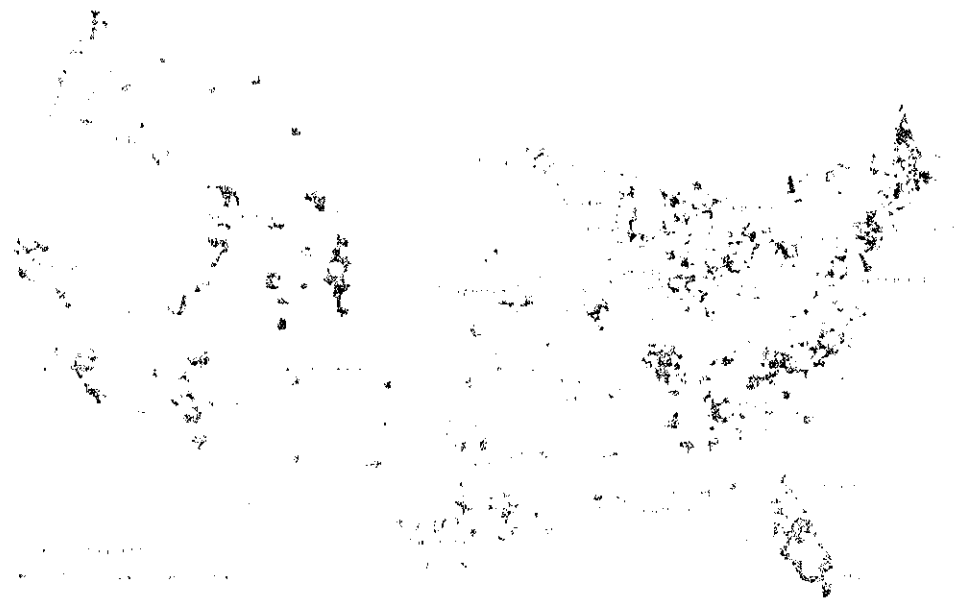
Nomadic VoIP Services: With respect to VoIP services that SMR via Sipmedia may offer on a nomadic or non-geographically relevant basis, Level 3's network is capable of transmitting E911 calls to any of the Selective Routers to which Level 3 is connected. Further, in accordance with the NENA Interim VoIP Architecture for Enhanced 911 Services (i2) to support nomadic E911, Level 3 is capable of transmitting, via Wireline E911 network connections, the Emergency Services Query Key ("ESQK") that allows an answering point to query the ALI database for the 911 caller's Registered Location.

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4. 911 Coverage: To the extent a provider has not achieved full 911 compliance with the requirements of the *VoIP 911 Order* in all areas of the country by November 28, 2005, the provider should: 1) describe in detail, either in narrative form or by map, the areas of the country, on a MSA basis, where it is in full compliance and those in which it is not; and 2) describe in detail its plans for coming into full compliance with the requirements of the order, including its anticipated timeframe for such compliance.

Response: See Attachment 1 below.

ATTACHMENT 1



5. Obtaining Initial Registered Location Information: A detailed description of all actions the provider has taken to obtain each existing subscriber's current Registered Location and each new subscriber's initial Registered Location. This information should include, but is not limited to, relevant dates and methods of contact with subscribers and a quantification, on a percentage basis, of the number of subscribers from whom the provider has obtained the Registered Location.

Response: SMR obtains the users registered location upon initial sign up for service. We have obtained this from 100% of our fixed location subscriber base.

6. Obtaining Updated Registered Location Information: A detailed description of the method(s) the provider has offered its subscribers to update their Registered Locations. This information should include a statement as to whether the provider is offering its subscribers at least one option for updating their Registered Location that permits them to use the same equipment that they use to access their interconnected VoIP service.

Response: SMR via Sipmedia, as part of our E9-1-1 solution, provides at least two ways of updating each subscriber's Registered Location. A subscriber can update via the SMR portal online or via calling our customer service.

7. Technical Solution for Nomadic Subscribers: A detailed description of any technical solutions the provider is implementing or has implemented to ensure that subscribers have access to 911 service whenever they use their service nomadically.

Response: We are in the process of working with our underlying provider of DID's Level 3 as well as a third party VPC to implement A Nomadic solution as per the diagram below.

